

**UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF GEORGIA  
MACON DIVISION**

**IN RE:** :  
 : **16-51331-JPS**  
**BRENDA C. MOSELEY** : **CHAPTER 13**  
**DEBTOR.** :

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**OBJECTION TO CONFIRMATION**

COMES NOW, Specialized Loan Servicing LLC ( “Movant”), who holds a secured lien on Debtor’s real property known as 140 Surrey Lane, Macon, GA 31210 (“Property”) , and objects to confirmation of Debtor’s proposed Chapter 13 Plan on the grounds that it does not comply with the provisions of 11 U.S.C. § 1322, 11 U.S.C. §1325 and 11 U.S.C. §506. In particular, Movant objects to Debtor’s proposed Chapter 13 Plan on the following grounds.

1.

Movant anticipates filing a secured claim in the approximate amount of \$96,875.18, including pre-petition arrears in the amount of \$89,188.21.

2.

Debtor’s Chapter 13 Plan as proposed fails to provide for curing the pre-petition arrearage owed to Movant during a reasonable period of time.

3.

Debtor’s Chapter 13 Plan as proposed states that the Property shall be sold no later than 12 months after confirmation.

4.

Debtor’s Chapter 13 Plan’s provides no monthly arrearage payment or interest payment and is insufficient to protect Movant’s interest.

5.

Upon information and belief, Debtor’s Chapter 13 Plan is not feasible.

6.

Debtor’s Chapter 13 Plan is not in the best interest of Debtor and Creditors.

WHEREFORE, Movant hereby objects to confirmation of the Debtor's Chapter 13 Plan, and requests that the Court decline to approve Debtor's Chapter 13 plan and grant such additional relief as the Court deems just and proper.

/s/ Chad R. Simon

Chad R. Simon

Georgia Bar No. 646919

Buckley Madole, P.C.

Post Office Box 80727

Atlanta, GA 30366

Chad.simon@BuckleyMadole.com

(770) 856-9046

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing Objection to Confirmation has been furnished by Electronic Mail or regular U. S. Mail to all parties listed below on this 25th day of August, 2016:

Brenda C. Moseley  
140 Surrey Lane  
Macon, GA 31210

Thomas Tillman McClendon  
Stone and Baxter, LLP  
577 Mulberry Street  
Ste 800  
Macon, GA 31204

Camille Hope  
Office of the Chapter 13 Trustee  
P.O. Box 954  
Macon, GA 31202

/s/ Chad R. Simon  
Chad R. Simon  
Georgia Bar No. 646919

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